Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 16-36 are pending in the application, with 16, 20, and 21 being the independent claims. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

Claims 16-20 stand rejected under 35 U.S.C. § 102(e), as being allegedly anticipated by U.S. Patent Application Publication No. 2003/0123452 to Cox et al. (herein "Cox"). Applicants respectfully traverse the rejection and provide the following arguments to support patentability as follows:

Claim 16 is directed to a system of packet classification. The system includes:

a pre-processor to receive a packet header of an incoming packet, the packet header including a field, and to assign an associated identifier to the field;

a first memory device, the first memory device including a first set of binary patterns;

a second memory device, the second memory device including a second set binary patterns;

a third memory device, the third memory device including instructions for applying one of the first and second sets of binary patterns to the associated identifier assigned to the field of the incoming packet; and

a processor to apply the instructions to the field to match the field to one of the patterns in the first set of binary patterns or second set of binary patterns.

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(*see*, claim 16).

Cox does not teach each of the foregoing features of claim 16. For example, as will be described in more detail below, Cox does not teach or suggest at least the feature of "a third memory device, the third memory device including instructions for applying one of the first and second sets of binary patterns to the associated identifier assigned to the field of the incoming packet" as recited by claim 16.

The Office Action dated March 27, 2007 (herein "Office Action") alleges a pattern tree data structure of Cox teaches or suggests "a first memory device," an ordered virtual data tree structure of Cox teaches or suggests "a second memory device," and a network processor parse tree program teaches or suggests "a third memory device" as those terms are used in claim 16. (*see*, Office Action, Page 2 through Page 3). According to Cox, the network processor parse tree program matches parsed values against pattern tree data structure to obtain virtual handles and then matches the virtual handles against ordered virtual tree data structure to obtain destination identification values. (*see*, Cox, para. [0034]). Thus, contrary to claim 16 that recites "applying one of the first and second sets of binary patterns," Cox applies both the pattern tree data structure and the ordered virtual tree data structure. Accordingly, Cox does not teach or suggest "a third memory device, the third memory device including instructions for applying one of the first and second sets of binary patterns to the associated identifier assigned to the field of the incoming packet" as recited by claim 16. Because Cox does not teach or suggest each and every feature of independent claim 16, Cox cannot anticipate that claim. Dependent claims 17-19 are likewise not anticipated by Cox for the same reason as claim 16 from which they depend and further in view of their own

respective features.   Accordingly, Applicant respectfully requests that the rejection of

claims 16-19 under 35 U.S.C. § 102(e) be reconsidered and withdrawn.

Claim 20 is directed to a method for packet classification. The method includes

the steps of:

> receiving a packet header of an incoming packet, the packet header
> including a field;
>
> assigning an associated identifier to the field;
>
> maintaining a first set of binary patterns and a second set binary patterns;
>
> applying one of the first and second sets of binary patterns to the
> associated identifier assigned to the field of the incoming packet; and
>
> matching the field of the incoming packet to one of the patterns in the first
> set of binary patterns or second set of binary patterns.

(see, claim 20)

For reasons discussed above in regard to claim 16, Cox does not teach or suggest

at least the step of "applying one of the first and second sets of binary patterns to the

associated identifier assigned to the field of the incoming packet" as recited in claim 20.

Consequently, Cox cannot anticipate claim 20.   Accordingly, Applicant respectfully

requests that the rejection of claim 20 under 35 U.S.C. § 102(e) be reconsidered and

withdrawn.

Allowed Claims

Applicants thank the Examiner for indicating the allowability of claims 21-36 in

the Office Action.

Comments on Statement of Reasons for Allowance

Applicants note the Examiner's Statement of Reasons for Allowance presented on pages 3 through 4 of the Office Action. Applicants reserve the right to demonstrate claims 21-36 are allowable over the art made of record for further reasons related to any of their recited features. Applicants further contend that reservation of this right does not give rise to any implication regarding whether the Applicants agree with or acquiesce in the reasoning provided by the Examiner.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot.   Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn.   Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.   If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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